

Appendix G

Coordination Records

December 18, 2000

Planning, Programs, and
Project Management Division (10-1-7c)

SEE DISTRIBUTION LIST

The Rock Island District of the U.S. Army Corps of Engineers is developing a National Environmental Policy Act (NEPA) Programmatic Document (PD) to address dredged material placement on environmentally non-contentious habitat types. This document is in response to a 1998 request by the United States Fish and Wildlife Service (USFWS) to save time and resources and reduce the workload for Rock Island District staff and the State and Federal environmental resource agencies that must review the environmental documents for individual dredged material placement actions. The PD is intended to detail the compliance process and procedures and programmatically quantify the effects of these actions on the habitat types listed below. The Rock Island District also would be following recommendations of the Council of Environmental Quality (40 CFR 1502.20) by eliminating repetitive discussions in future Environmental Assessments.

This PD will evaluate typical dredged material placement actions in the most common, environmentally non-contentious habitat types. The PD will address placement of dredged material in the Rock Island District, and will include placement of dredged material from River Mile 300 to 614 on the Upper Mississippi River and from River Mile 80 to 286 on the Illinois Waterway, excluding the navigable canals above the Brandon Road Lock (see attached Figure 1). Following consultation with State and Federal resource agencies (e.g., the USFWS, the U.S. Environmental Protection Agency, Wisconsin Department of Natural Resources, Iowa Department of Natural Resources, Illinois Department of Natural Resources, and the Missouri Department of Conservation) during 1998 through 2000, including a resource agency workshop in August of this year, six site categories were identified as containing potential environmentally non-contentious habitat types for dredged material placement:

Agricultural Field. These sites are located in fields that are, or have recently been, used for agricultural purposes.

Behind the Levee Placement. These sites are located on the landward side of an existing levee. These sites will typically consist of agricultural fields or fallow areas.

Levee Stabilization. These sites increase in width or fortify, but not raise, existing levee structures.

Temporary Stockpile. These placement areas would have dredged material placed upon them for periods of less than 1 year. These temporary stockpiles may be used as transfer sites, emergency sites, or beneficial use stockpiles.

Rehandle Sites. Aquatic placement sites that would be used to place dredged material for a short period of time until the dredge can move it to another location. Often, rehandle sites are located in dredge cuts. Rehandle sites differ from temporary stockpile sites in that their use is short-term, limited to a period of days (generally less than 2 weeks).

Disturbed Sites. These are highly disturbed habitats that would not experience substantial adverse affects from dredged material placement. These sites could include, but are not limited to, old abandoned quarries, landfills, parking lots, and other urbanized areas.

Previous coordination efforts identified thalweg habitats as a potential alternative for this programmatic NEPA document. However, based on comments received from State and Federal agencies at the workshop this past August, a thalweg alternative was removed from this effort.

The Rock Island District recognizes that unique and significant resources may exist within each of these habitat types. The District has developed criteria to further define the locations that can be utilized for future dredged material placement, as addressed under this NEPA document. These criteria have recently been distributed by electronic mail to State and Federal agency representatives who attended the August workshop, and are included as an attachment. Future placement sites that are not covered within these habitat types and those with unique and significant resources will require separate non-tiered NEPA documentation. Moreover, any future project that will tier off the PD will still require supplemental NEPA documentation, including full and complete coordination with State and Federal resources agencies.

The PD is expected to be distributed early next year. This letter is to inform you of the refinements to the proposed project in response to recent coordination, and to ask for your agency's official comments. The information provided should allow you to make comments on the proposed project. Any comments on the proposed project are welcome. In addition, the Rock Island District would specifically like comments relating to existing processes of compliance for dredged material placement activities, problems with the programmatic process, and agreement with the approach and identified habitat types. A timely review of this information and a written response for inclusion into the PD would be greatly appreciated. Please provide your written recommendations, comments, and concerns relative to resources in your area of expertise no later than 30 days from the date of this letter. All comments must be received within this 30-day time frame.

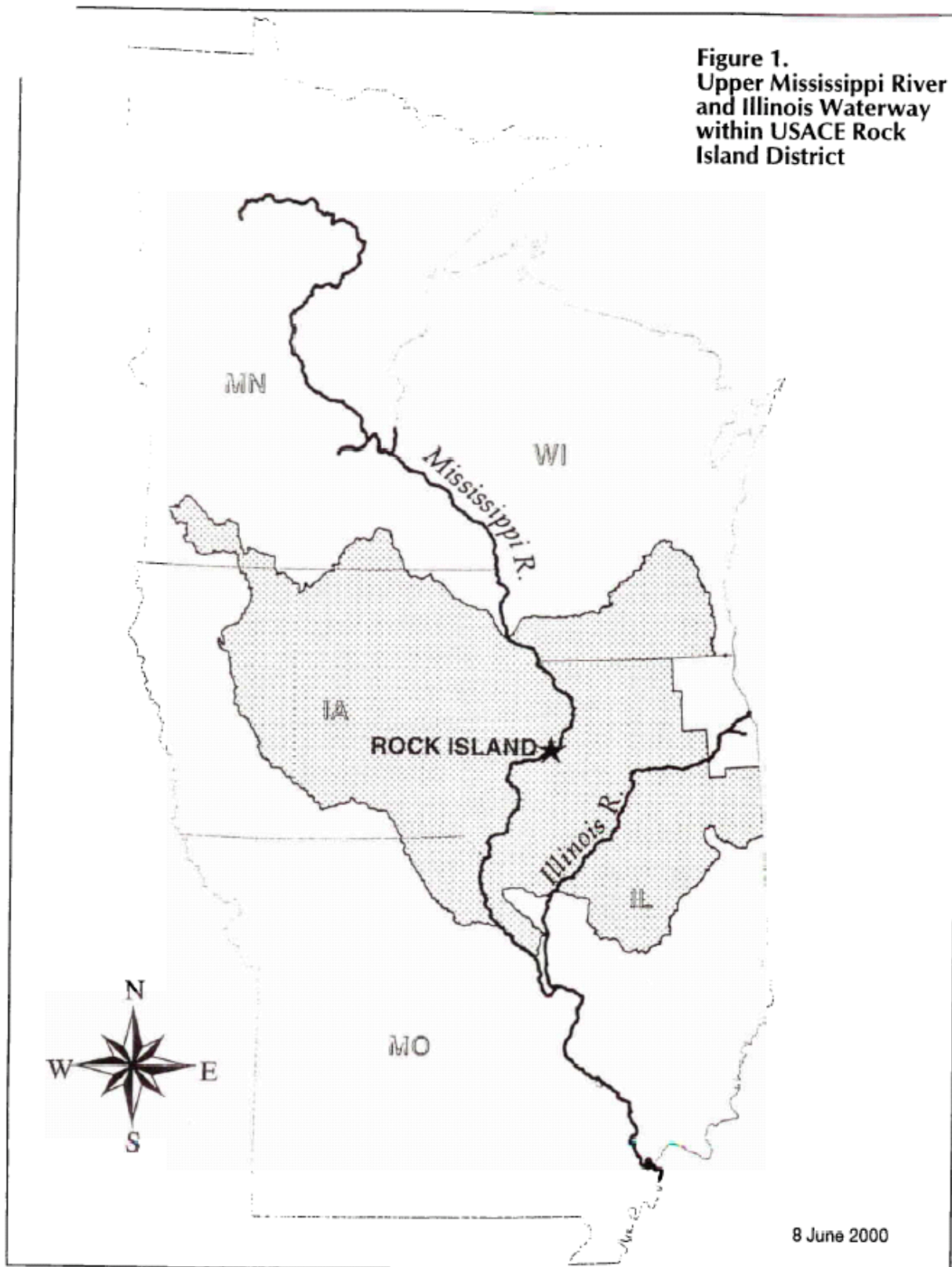
In addition to a response to this letter, additional opportunities for comments will occur during the NEPA process. If you have any questions, please call Mr. Elliott Stefanik of our Environmental Analysis Section, telephone 309/794-5285, or write to our address above, ATTN: Planning, Programs, and Project Management Division (Elliott Stefanik).

Sincerely,

ORIGINAL SIGNED BY
Dorene A. Bollman
for Kenneth A. Barr
Chief, Economic and Environmental
Analysis Branch

Attachments

Figure 1.
Upper Mississippi River
and Illinois Waterway
within USACE Rock
Island District



Criteria for placement sites addressed within the Programmatic NEPA Document (PD) for non-contentious placement of dredged material.

This PD is targeted at addressing dredged material placement at sites within six identified habitat types. These include the following:

- **Agricultural Field.** These sites are located in fields that are, or have recently, been utilized for agriculture purposes.
- **Behind the Levee Placement.** To the extent possible, behind the levee sites will consist of agricultural fields or fallow areas.
- **Levee Stabilization.** Dredge material placement utilized for levee stabilization would increase in width, or fortify, existing levee structures. Levee stabilization, as it applies to projects associated with this PD, will not increase the height of existing levee structures.
- **Temporary Stockpile.** These placement areas would have dredged material placed upon them for periods of less than one year.
- **Disturbed Sites.** These sites are highly disturbed habitats that would not experience substantial adverse affects from dredged material placement. These sites would include, but are not limited to, old abandoned quarries, landfills, parking lots, and urbanized areas.
- **Rehandle Sites.** These are aquatic placement sites that would be used to place dredged material for a short period of time until the dredge can move it to another location. Rehandle sites differ from temporary stockpile sites in that their use is short-term, limited to a period of days (generally less than two weeks).

These habitat types were selected as locations that were less environmentally sensitive for dredge material placement. However, the District has identified several conditions frequently encountered in the placement of dredged material that may be problematic. Issues such as wetlands, HTRW concerns, unique resources (e.g., presence of mast producing trees), cultural resource issues, and occasionally concerns with State and federal listed species, can occur within these six habitat types. However, under the PD, these conditions would be addressed by abiding by the criteria given below for each of the six listed habitat types:

- **Wetlands** - Wetlands will be avoided to the extent possible. However, if any wetland area is utilized for material placement, these impacts will be minimized and mitigated for as appropriate utilizing the mitigation plan included in the SEA. Each site will be delineated for presence/absence of wetlands utilizing the criteria developed by the Corps of Engineers (USCOE Wetlands Delineation Manual, Technical Report Y-87-1, January 1987). These delineations will be performed by the NRCS for privately owned agricultural land and by the District on publicly owned lands. Agricultural areas identified as "prior converted wetlands" may be utilized for dredged material placement without mitigation. The PD does not propose to address any placement site solely targeted at wetland habitats. Any potential future placement in wetland areas will be coordinated with State and federal resource agencies and thoroughly addressed as a site-specific impact in any SEA.

- ***Federal or State listed Threatened and Endangered species*** – Dredged material placement sites that would impact any federal or State listed species, even within the six habitat types previously identified, would not be covered by this PD. Placement in such locations would require a separate NEPA process. This impact would be identified through coordination with the appropriate state and federal resource agencies prior to implementation of the project. This coordination would be in the form of written correspondence with the USFWS as required by the Endangered Species Act of 1973.
- ***Hazardous Toxic and Radioactive Waste*** – Only dredged material placement sites identified by the District through a Phase I HTRW Environmental Site Assessment with no HTRW concerns will be considered under this PD. This assessment is done in accordance with ER 1165-2-132, HTRW guidance for civil works projects and ER 405-1-12 the Real Estate handbook, based upon ASTM standards E 1527-97 and E 1528-96.
- ***Areas of significant cultural concern*** - The District and the Illinois, Iowa, Missouri, and Wisconsin State Historic Preservation Officers and the Advisory Council on Historic Preservation have signed a PA (Programmatic Agreement) regarding implementation of the long-term management strategy for dredged material placement for the DMMP (Dredged Material Management Plan) on the Illinois Waterway RM 80.0 to 327.0 and Mississippi RM 300.0 to 614.0. This PA is an appropriate vehicle for addressing historic property concerns for dredged material placement. The PA affords protection to undocumented historic properties, as well as those significant elements of the National Register of Historic Places. If any previously undocumented historic properties were discovered during the undertaking, the District would discontinue dredging operations and resume coordination with the IHPA to identify the significance of the historic property and determine potential effects under Section 106 of the NHPA.
- ***Unique environmental resources*** – Any unique environmental resources such as mast producing trees or mussel beds will be avoided, to the extent possible. The significance of these existing environmental resources will be identified and considered in coordination with appropriate federal and State agencies. This coordination will be in the form of written correspondence with representatives from appropriate State and federal agencies. The PD does not propose to address any placement site solely targeted at these unique habitat areas. Any potential future placement within unique areas will be coordinated with State and federal resource agencies and thoroughly addressed as a site-specific impact in any SEA.
- ***Floodway/Flood Conveyance Issues*** – Impacts to the floodway and flood conveyance will be avoided to the extent possible. Any potential future placement will be coordinated with State and federal resource agencies and thoroughly addressed as a site-specific impact in any SEA.

To further ensure the future placement of dredged material on the identified habitat types will minimize potential impacts and remain environmentally non-contentious, the District has developed additional specific criteria for each habitat type. For tiering off of this PD and in addition to those found above, future placement on agricultural fields and rehandle sites will follow the criteria given below.

Agricultural Field. These sites are located in fields that are, or have recently, been utilized for agriculture purposes. For placement on agricultural fields, every effort will be made to purchase or obtain easement land from willing land owners. Every effort also will be made to place dredged material on Non Prime farmland, or on Prime Farmland meeting one of the following criteria:

- Remote field with poor access

- Low lying land which floods frequently
- Severed parcels and uneconomical remnants less than three acres in size, where operationally feasible
- Previously disturbed borrow sites
- Existing state-owned or other public lands
- Land comprised of soils possessing relative values greater than 75
- Sites approved by State and/or federal agricultural agencies on a case by case basis

If Prime Farmland cannot be avoided, then a series of measures will be pursued to minimize impacts to agricultural interests. These may include reducing the footprint by placing dredged material higher, purchasing only the minimum amount of land needed for material placement, and establishing a lease agreement for farming of a placement site until the site is needed for placement.

Rehandle Sites. These are aquatic placement sites that would be used to place dredged material for a short period of time until the dredge can move it to another location. Rehandle sites differ from temporary stockpile sites in that their use is short-term, limited to a period of days (generally less than two weeks). Frequently, rehandle sites will consist of placement of dredge material into a dredge cut for later removal. However, rehandle sites also can occur within other aquatic placement areas. In order to limit the types of places that could be utilized as rehandle sites under this PD, placement areas also will avoid:

- sites with dense unionid mussel beds (as defined below)
- backwater and side channel areas
- areas where mass movement of sand will occur into environmentally sensitive areas (backwaters, side channels, etc.).
- areas with significant cover or structure (e.g., logs piles, rock structures, submergent and emergent vegetation, etc.) forming potential fisheries habitat.

To date, few recommendations exist to identify or delineate mussel beds in the UMRS. However, Whitney et al. (1997, *A comprehensive mussel survey of the Illinois River, 1993-95*) has recommended criteria for defining mussel beds on the IWW. They defined mussel beds as those meeting the following criteria: (1) mean brailing CPUE of ≥ 6 mussels/5min; (2) mean timed diver search CPUE ≥ 10 mussels/5min; or (3) mean quadrat density ≥ 5 mussels/m². For purposes of this programmatic document, dense unionid beds will be identified by the second and third criteria. Because zebra mussels can inhibit the ability of native unionids to attach to a brail during brail surveys, the District does not consider this a viable method for determining mussel bed density and would not utilize this method (as discussed in the first criteria above) under the PD. In addition, the District may utilize new technologies such as hydroacoustics surveys if they demonstrate a verifiable accuracy in identifying and quantifying the density of mussel beds.

By their nature rehandle sites are aquatic habitats and thus, may potentially be delineated as wetland areas. Placement in such areas will be avoided to the extent possible. However, if any wetland area is utilized for short-term material placement, these impacts will be minimized and mitigated for as appropriate. Any potential placement in these areas will be coordinated with State and federal resource agencies and thoroughly addressed within any SEA.

DISTRIBUTION LIST

Mr. Bob Clevensine
U.S. Fish and Wildlife Service
4469 - 48th Avenue Court
Rock Island, IL 61201

Mr. Al Fenedick
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Mr. Francis Lyons
Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Mr. George Meyer
Secretary
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

Ms. Gretchen Benjamin
Wisconsin Department of Natural Resources
3550 Mormon Coulee Road
La Crosse, WI 54601

Mr. Lyle Asell
Interim Director
Iowa Department of Natural Resources
Henry A. Wallace Building
502 East 9th
Des Moines, IA 50319

Mr. Mike Griffin
Iowa Department of Natural Resources
206 Rose Street
Bellevue, IA 52031

Mr. Bernard Schonoff
Iowa Department of Natural Resources
3390 Highway 22
Muscatine, IA 52761

Mr. Brent Manning
Director
Office of the Director
Illinois Department of Natural Resources
524 South 2nd Street, 4th Floor
Springfield, IL 62701

Mr. Dan Sallee
Illinois Department of Natural Resources
P.O. Box 149
Aledo, IL 61231

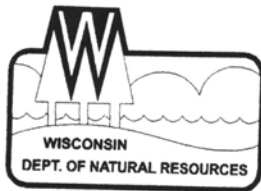
Mr. Jerry Conley
Director
Missouri Department of Conservation
2901 West Truman Boulevard
Jefferson City, MO 65109

Mr. Gordon Farabee
Missouri Department of Conservation
2901 West Truman Boulevard
Jefferson City, MO 65109

Mr. Charles Whitmore
Regional Conservationist
United States Department of Agriculture
Natural Resources Conservation Service
Midwest Regional Office
2820 Walton Commons West, Suite 123
Madison, WI 53718-6797

Mr. Jim Hartwig
Illinois Department of Agriculture
Bureau of Land and Water Resources
Illinois State Fair Grounds
P.O. Box 19281
Springfield, IL 62706

CDR Scott Cooper
Commanding Officer
Marine Safety Office
U.S. Coast Guard, 2nd District
1222 Spruce Street, Suite 1215
St. Louis, MO 63103-2835



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Scott A. Humrickhouse, Regional Director

3550 Mormon Coulee Rd
La Crosse, Wisconsin 54601
Telephone 608-785-9000
FAX 608-785-9990

December 19, 2000

Mr. Elliott Stefanik
Rock Island District - Corps of Engineers
P.O. Box 2004
Rock Island, IL 61204-2004

Comments on the Criteria for placement sites addressed within the Programmatic NEPA Document.

Dear Mr. Stefanik:

The following comments are prepared in response to the email you sent listing the criteria for placement sites addressed within the Programmatic NEPA Document, on 12/8/00.

Temporary Stockpile - The temporary use of undisturbed sites would significantly alter the value of the habitat and therefore, would not qualify under the Programmatic NEPA Document. On review of the **Disturbed Site** definition, it appears that Temporary Stockpiles may fit best within that definition. For these areas to be considered non-contentious the Temporary Stockpile will have to be placed on a previously disturbed site such as historic dredge material placement site, or urban/industrial site.

Rehandle Sites - The use of Rehandle sites should be minimized as much as possible. When use of a Rehandle Site is necessary, the site should be located within historic dredge cuts to minimize the disturbance to aquatic habitat. If an area has not been dredged for 5 to 10 years, a mussel survey is necessary to determine the extent site recovery. If the site has not been dredged for 10 or more years it should be treated as a healthy aquatic habitat and should not be considered for a Rehandling Site.

In reference to the mussel sampling discussion on the last page, the Wisconsin Department of Natural Resources is currently delineating mussel beds from historic records and sampling efforts. We will provide that information to the Rock Island District when it is complete.

Furthermore, we believe additional clarification is necessary within the paragraph indicating that number of mussels may not provide a complete account of the value of a particular mussel bed. The following sentence should be added after the sentence about mussel bed criteria, "In addition to the number of mussels, species richness and State and Federally listed species must be considered when determining the importance of a mussel bed."


Quality Natural Resources Management



Mr. Elliott Stefanik, 12/19/2000

Thank you, for the opportunity to comment on these definitions and please contact me if you have any questions.

Sincerely,


Gretchen L. Benjamin
Mississippi River Planner

C Ken Brummett, MODOC, Jefferson City, MO
 Dan Saltee, ILDNR, Aledo, IL
 Alan Fenedick, USEPA, Chicago, IL
 Mike Griffin, IADNR, Bellevue, IA



George H. Ryan, Governor • Joe Hampton, Director

Bureau of Land and Water Resources

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/782-6297 • TDD 217/524-6858 • Fax 217/557-0993

December 21, 2000

Mr. Elliott L. Stefanik
U.S. Army Corps of Engineers, Rock Island District
P.O. Box 2004, Clock Tower Building
Rock Island, Illinois 61204

Re: Programmatic NEPA Document
Dredge Material Placement

Dear Mr. Stefanik:

The Illinois Department of Agriculture (IDA) submits the following comments on the criteria to further define potential placement site categories for the Corps of Engineers (COE) programmatic NEPA document for dredge material placement.

The potential dredge material placement sites have been narrowed down to six habitat types, including the following: (a) agricultural fields, (b) behind the levee, (c) levee stabilization, (d) temporary stockpile, (e) disturbed sites, and (f) rehandle sites. Additional criteria has been developed to minimize the impact of placing dredge material placement on Prime farmland.

The use of non-Prime farmland or Prime farmland meeting one or more of the seven criteria listed in the Programmatic NEPA Document continues to be acceptable dredge material placement sites to the IDA. However, the IDA is very concerned that Prime farmland beyond that which has been identified as acceptable may become potential placement sites due to the unavailability of other sites.

These restrictions include, but are not limited to, the presence of wetlands, thalwegs, threatened and endangered species, unique resources such as mast producing trees and mussel beds, floodway/floodway conveyance, restrictions on rehandle sites, HTRW sites, temporary sites that significantly alter the value of the habitat, sites that have not been dredged for 10 years or more, the absence of levees that need stabilization, the absence of temporary stockpiles and previously disturbed sites, etc. So many restrictions are placed on potential sites that it appears as though Prime farmland possessing viability for long term, efficient agricultural use will be the site of choice for the placement of dredge materials.

There must be some compromise and give-and-take in the utilization of sites for the placement of dredge materials. Agricultural land must not become the default site if no other sites are acceptable to other natural resource agencies. Agricultural land is a finite natural resource possessing environmental, economic, and social attributes that cannot be matched by the other natural resources. In the last 49 years, at least 4,000,000 million acres of farmland (source: *Illinois Agricultural Statistics, 2000 Annual Summary*) have been converted to other uses which represents a 12.6% reduction of this state's land in farms. Many other states in the nation have

Mr. Stefanik
Page 2
December 21, 2000

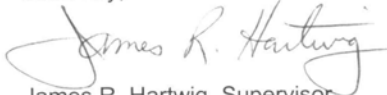
conversion rates that far exceed that of Illinois which only increases the importance of preserving Illinois farmland that is best suited to long term agricultural production. The incremental conversion of small tracts of farmland for dredge disposal sites exacerbates the problem further.

One may be inclined to believe that the use of a few acres of Prime farmland for dredge disposal sites will not have a noticeable impact on this state's supply of farmland. The same could be said of the use of wetlands, floodways, mussel beds, areas growing mast producing trees, etc. The IDA is of the opinion that all areas of the natural environment, including Prime farmland, should share the impact of dredge disposal. No one resource should be impacted at the exclusion of the others.

While the federal Farmland Protection Policy Act (7 U.S.C. 4201 et seq.) does not prohibit federal agencies from using Prime farmland for nonagricultural uses, it does require them to consider alternative actions that could lessen the adverse effects of their actions on Prime farmland and to assure that their programs are compatible with state programs to protect farmland. Since Illinois has a program which requires state agencies to minimize the impact of their actions on farmland, the COE should likewise minimize the impact of its dredge disposal program on the conversion of Prime farmland.

The IDA is willing to work with the COE and the other natural resource agencies on the identification of acceptable dredge disposal sites; however, we expect a program that will not transfer the brunt of the impact to agricultural land. The burden must be one which is shared. Please feel free to contact either Ms. Terry Savko of my staff or me to further develop the COE's dredge material placement plan.

Sincerely,



James R. Hartwig, Supervisor
Office of Farmland Protection and Mined Land Reclamation

JRH/ts

cc: Director Joe Hampton, IDA
Joan Messina, IDA
Mike Williams, IDA
John Cross, IDA
John Herath, IDA
Warren Goetsch, IDA
Steven Frank, IDA
Terry Savko, IDA



THOMAS J. VILSACK
GOVERNOR
SALLY J. PEDERSON
LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LYLE W. ASELL, INTERIM DIRECTOR

Kenneth A. Barr
USACE- Rock Island
Clock Tower Building P. O. Box 2004
Rock Island, IL 61204

January 2, 2001

Mr. Barr

The following comments are provided by the Iowa DNR on the latest revision of criteria for placement sites within the NEPA Programmatic Document (PD). And are provided in response to your letter of 18 December 2000.

Temporary stockpiles- To fit within the non-contentious category temporary stockpiles would have to avoid undisturbed area i.e. natural shorelines or aquatic areas. Otherwise the area in question would need to be evaluated as to how long the impact may occur and how significant they may be.

Rehandle Sites- If rehandle sites within this Programmatic Document were limited to placement within the dredge cut it would remove all concerns and make them fall into the non-contentious category.

We concur with your decision to not use brailing as a method to capture native mussels in delineating mussel beds. Due to the decrease in native mussel fauna caused by several factors including the introduction of zebra mussels, protection of these resources is very important. Areas with historic records of native mussels should be avoided since these may offer the only areas useable for recolonization. Also collection of any state or federally listed species should remove an area from consideration as a rehandle site.

We agree with your decision to remove thalweg sites from the list of potential disposal areas for this PD.

Sincerely,

Bernard Schonhoff
Mississippi River Biologist

cc: Szcodronski
4 states
USFWS
Griffin





MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ♦ Missouri Relay Center: 1-800-735-2966 (TDD)

JERRY M. CONLEY, Director

January 22, 2001

Mr. Elliott L. Stefanik
Biologist
U.S. Army Corps of Engineers, Rock Island District
P.O. Box 2004, Clock Tower Building
Rock Island, Illinois 61204

Re: Programmatic NEPA Document

Dear Mr. Stefanik:

Thank you for providing the opportunity to comment on the Rock Island District's recently completed draft document titled *Programmatic NEPA for Dredged Material Placement*. Staff within the Missouri Department of Conservation have reviewed the subject document, and offer the following comments:

- The six identified site types for potential dredged material disposal are not "habitats" as defined or used in literature. We would prefer they be labeled "placement site type". We recommend the document not contain the word "habitat(s)" unless referring to actual habitats like backwaters, wetlands, etc.
- In the Levee Stabilization section, will there be any provision describing the use of, or prevention of the use, of dredge material once the material is used for levee fortification?
- In the Temporary Stockpile section, we recommend additional clarification of the types of sites that are being considered for temporary stockpiles. If the site is aquatic, the document should discuss the anticipated physical and environmental effects. Will terrestrial sites be designated as beneficial use sites?
- Acronyms need to have their full phrase or name, followed by the acronym in parentheses, the first time they appear in the document.
- In the Agricultural Field paragraph, please explain what "soils possessing relative values greater than 75" means. Additionally, we recommend adding a "low-lying land which floods frequently" to the list. We believe land in that class has the potential to become valuable wetland habitat, depending on its current or future use.

COMMISSION

ANITA B. GORMAN
Kansas City

RANDY HERZOG
St. Joseph

RONALD J. STITES
Plattsburg

HOWARD L. WOOD
Bonne Terre

Mr. Elliott L. Stefanik

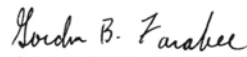
Page 2

January 22, 2001

- In the Rehandle Sites section, please add “gravel bars” and the “mouths of tributaries” to sites that are to be avoided. We recommend the document designate a distance above specified sites as a buffer.
- Define/determine what constitutes a “mussel bed”, as this term is often interpreted differently.
- In the Unique Environmental Resources section please clarify whether “mast producing” means hard mast or soft mast, or both. There are several soft mast species that don’t need assistance in populating an area. From a forest species diversity view, additional species of soft mast, such as persimmon, should be included with any hard mast species.

Again, thank you for providing our agency the opportunity to comment on this worthwhile document.

Sincerely,


GORDON B. FARABEE
POLICY COORDINATOR

c: Ken Brummett



IN REPLY REFER
TO:

FWS/RIFO

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Rock Island Field Office
4469 48th Avenue Court
Rock Island, Illinois 61201
Tel: 309/793-5800 Fax: 309/793-5804

February 15, 2001

U.S. Army Engineer District
Rock Island
ATTN: Planning Division (Elliott Stefanik)
Clock Tower Building, P.O. Box 2004
Rock Island, Illinois 61204-2004

Dear Mr. Stefanik:

This letter is in response to your distribution of proposed criteria for dredged material placement sites to be addressed programmatically under the National Environmental Policy Act. These criteria were distributed via email on December 8, 2000. The implementation of a programmatic approach has been discussed by the partner agencies for two years. As the action agency, you have the decision-making responsibility regarding the scope of the project and alternatives to be addressed in detail. While we have expressed our support for the most inclusive scope, including a supplement to the 1976 Environmental Impact Statement for Operation and Maintenance of the Nine-Foot Channel Project, we understand your rationale for limiting the scope via the criteria proposed and wish to move ahead with the analysis.

By executing the programmatic analysis for sites described by the subject criteria, you will be able to pursue completion and implementation of those Dredged Material Management Plans which involve those sites. Nothing in the criteria appear to void or limit any agency's responsibilities under current environmental regulation or guidance. Consequently, we recommend that you initiate the analysis process at your earliest convenience.

This letter provides comment under the authority of and in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended: 16 U.S.C. 661 et seq.) and the Endangered Species Act of 1973 (ESA), as amended. Questions regarding this letter may be directed to Mr. Bob Clevensine at the above telephone number, ext. 521.

Sincerely,

Richard C. Nelson
Supervisor

Elliott Stefanik

2

cc: FWS R3 (Lewis)
EPA (Fenedick)
ILDNR (Schanzle, Sallee, Poulter)
MoDOC (Brummett, Jackson)
IaDNR (Griffin)
WDNR (Benjamin)

G:\WP_Docs\BOB\p-matic.wpd



ILLINOIS
DEPARTMENT OF
NATURAL RESOURCES

524 South Second Street, Springfield 62701-1787

George H. Ryan, Governor ● Brent Manning, Director

May 17, 2002

Mr. Elliott Stefanik
Biologist
US Army Corps of Engineers
Rock Island District
P.O. Box 2004, Clock Tower Building
Rock Island, IL 61204

Dear Mr. Stefanik:

We apologize for the delay in response regarding the draft *Programmatic NEPA for Dredged Material Placement* and hope that this has not delayed completion of the final report.

Our agency appreciates the coordination that has been achieved in preparation of this report containing criteria for selection of dredged material placement sites that will be covered programmatically. We support the programmatic approach as a means of reducing paperwork and saving valuable time for all agencies involved, and do not feel this will limit our ability to protect riverine habitat.

We look forward to continued coordination on dredging and other matters concerning operation and maintenance for commercial navigation, anticipating that we may one day be coordinating on operation and maintenance for river ecosystems as well.

Sincerely,

Scott Stuewe
Corps Project Manager
Office of Resource Conservation
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702

[printed on recycled and recyclable paper]